

**United States Bankruptcy Court
Northern District of Illinois, Eastern Division**

IN RE: Elicia T. Williams-Collins) Chapter 13
Debtor(s)) Case No. 17 B 38344
) Judge LaShonda A. Hunt

Notice of Motion

Elicia T. Williams-Collins
21624 Dogwood Rd.
Matteson, IL 60443

Debtor Attorney: David M Siegel
via Clerk's ECF noticing procedures

On April 02, 2018 at 10:30 am, I will appear at the location listed to the right, and present this motion.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail or by the methods indicated on or before Friday, March 23, 2018.

> Dirksen Federal Building
> 219 South Dearborn
> Courtroom 719
> Chicago, IL 60604

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE

Motion to Dismiss Case For Unreasonable Delay

Comes now Marilyn O. Marshall, Standing Trustee, and requests that this case be dismissed, as Debtor(s) failed to file the required documents pursuant to 11 USC §521, §1307, §349, and Rule 3015, and in support thereof states the following:

1. Debtor(s) filed for Chapter 13 on 12/29/2017.
2. The debtor(s) have failed to provide copies of all payment advices or other evidence of payment received within 60 days before the date of filing the petition.
3. The debtor(s) have failed to resolve the pending objection(s) to the plan.
4. The debtor(s) have failed to commit all disposable income to the plan.
5. The debtor(s) have failed to propose a plan in good faith or to file a petition in good faith as required under §1325(a)(3) and (a)(7).
6. Debtor has failed to provide proof of income tax liability and childcare expense.
7. Debtor has failed to properly complete Section 2.2 of the plan.
8. Debtor has failed to check the third box in Section 5.1 of the plan.
9. Debtor has failed to amend schedule G to remove auto lease.
10. The debtor's failure to confirm a plan in a timely manner constitutes unreasonable delay.

WHEREFORE, the Trustee prays that this case be dismissed, and for any and all other relief this court deems just and proper.

Office of the Chapter 13 Trustee
224 S Michigan Ave
Ste 800
Chicago, IL 60604
(312) 431-1300

/s/ MARILYN O. MARSHALL

MARILYN O. MARSHALL, TRUSTEE